MEMO ENDC

LAW OFFICES OF VINCENT E. BAUER

475 Park Avenue South, 25th flood DOCUMENT New York, NY 10016

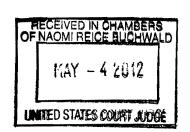
Vincent E. Bauer Barbara Meister Cummins Wendy C. Lecker (law clerk) USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 5820

Tel: 212-575-1517 Fax: 212-689-2726

VIA TELECOPIER

May 4, 2012

Hon. Naomi Reice Buchwald United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007



Subject: Fountainhead Capital Partners, Limited v. Sino-Shipping Holdings, Inc., 11 cv 9485

Dear Judge Buchwald:

We represent the Plaintiff, Fountainhead Capital Partners, Limited, in the above-referenced action. We write to request, pursuant to Rule 4(m) of the Federal Rules of Civil Procedure, an extension of time to serve the Complaint filed herein.

On December 23, 2011, Plaintiff filed the Complaint in this Court against Sino-Shipping Holdings, Inc. for breach of contract. On January 20, 2012, the Plaintiff served both United Corporate Services, Inc. and The Corporation Trust Company, since both companies were listed with the Delaware Division of Corporations as the registered agents of Defendant Sino-Shipping Holdings, Inc.

Shortly after service of the Complaint, on February 2, 2012, Wolter Kluwer, one of the purported registered agents, filed a letter with the Clerk stating that its statutory representation services were discontinued for Sino-Shipping Holdings, and thus, they were returning the documents. Since receiving this letter, the Plaintiff has research extensively the whereabouts of Sino-Shipping Holdings, a subsidiary of a Chinese company that was formed for the sole purpose of entering into the contract with the Plaintiff. The Plaintiff was unable to obtain service within the requisite 120 days. The Plaintiff was unable to find any operations or employees in the U.S. until recently when the Plaintiff discovered a local agent that is acting on behalf of Sino — Shipping Holdings for the filing of its SEC requirements. Plaintiff is seeking an additional 30 days to serve this local agent with the Complaint so that Plaintiff can proceed with its case.

In terms of my appearance as co-counsel in this case, please be advised that Scott Griffin, Esq., the attorney that filed these papers, resigned from Marshall Grant, P.L. on March 5, 2012. I will be contacting him regarding a stipulation regarding the transfer of the file. Please contact the undersigned if the Court has any questions.

5/7/12

Respectfully submitted,

Vincent E. Bauer